

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**ANTONIO BENNETT,**

**Plaintiff,**

**v.**

**LVNV FUNDING, LLC,**

**Defendant.**

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**CASE NO.**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that on this date, Defendant LVNV Funding, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Monroe County, Pennsylvania and in support thereof avers as follows:

1. LVNV Funding, LLC is the Defendant in a civil action originally filed on May 2, 2024, in the Court of Common Pleas of Monroe County, Pennsylvania titled *Antonio Bennett v LVNV Funding, LLC* and docketed to Case No. 2971 CV 2024.

2. This removal is timely under 28 U.S.C. § 1446(b). LVNV Funding, LLC received service of Plaintiff's Complaint by Certified Mail on June 13, 2024.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against the Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, LVNV Funding, LLC has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Monroe County, Pennsylvania.

WHEREFORE, Defendant LVNV Funding, LLC respectfully removes this case to the United States District for the Middle District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER BURNETTE, LTD.**

By: /s/ Lauren M. Burnette  
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*Counsel for Defendant*

Dated: July 3, 2024

**CERTIFICATE OF SERVICE**

I certify that on July 3, 2024, a true copy of the foregoing document was served on all unrepresented parties and counsel of record by electronic service and/or U.S. Mail, postage prepaid.

**MESSER STRICKLER BURNETE, LTD.**

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*Counsel for Defendant*

Dated: July 3, 2024